

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

2. On or about February 7, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

(Using or Maintaining a Drug Premises,
21 U.S.C. § 856(a)(1))

The Grand Jury further charges:

3. On or about February 7, 2022, in the Northern District of Ohio, Eastern Division, Defendant FRANCINE COREY did unlawfully and knowingly use and maintain a place located at XXX W. 35th St., Ashtabula, Ohio, for the purpose of distributing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 4

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

4. On or about February 8, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute approximately 12.91 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 5

(Using or Maintaining a Drug Premises,
21 U.S.C. § 856(a)(1))

The Grand Jury further charges:

5. On or about February 8, 2022, in the Northern District of Ohio, Eastern Division, Defendant FRANCINE COREY did unlawfully and knowingly use and maintain a place located at XXX W. 35th St., Ashtabula, Ohio, for the purpose of distributing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 6

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

6. On or about February 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

7. On or about February 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; and cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime,
18 U.S.C. §§ 924(c)(1)(A)(i))

The Grand Jury further charges:

8. On or about February 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly possess a firearm in furtherance of a drug trafficking crime for which Defendant may be prosecuted in a court of the United States, that is, Distribution of a Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(C) as charged in Counts 6 and 7 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 9

(Using or Maintaining a Drug Premises,
21 U.S.C. § 856(a)(1))

The Grand Jury further charges:

9. On or about February 11, 2022, in the Northern District of Ohio, Eastern Division, Defendant FRANCINE COREY did unlawfully and knowingly use and maintain a place located at XXX W. 35th St., Ashtabula, Ohio, for the purpose of distributing fentanyl, a Schedule II controlled substance; and cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT 10

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

10. On or about February 15, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a

mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 11

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

11. On or about February 15, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 12

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

12. On or about March 2, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 13

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

13. On or about March 2, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 14

(Felon in Possession of a Firearm, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury further charges:

14. On or about March 8, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES knowing he had previously been convicted of crimes punishable by imprisonment for terms exceeding one year, those being: Attempted Escape, a felony of the fourth degree, on or about December 1, 2009, in Case Number CR-09-525581, in the Cuyahoga County Common Pleas Court; Aggravated Trafficking in Drugs, a felony of the second degree, on or about August 15, 2018, in Case Number 2018 CR 00248, in the Ashtabula County Common Pleas Court; Attempted Failure to Comply With an Order or Signal of Police Officer, a felony of the fourth degree, on or about April 21, 2016, in Case Number 2015 CR 00470, in the Ashtabula County Common Pleas Court; Illegal Conveyance of Drugs into a Detention Facility, a felony of the third degree, on or about August 2, 2007, in Case Number 2007 CR 0032, in the Ashtabula County Common Pleas Court; knowingly possessed in and affecting interstate commerce a firearm, to wit: a Taurus, revolver, model 82, .38 caliber bearing serial number VA929758; and a Glock pistol, model 43, 9mm caliber, bearing serial number BFTV501, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 15

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

15. On or about March 9, 2022, through March 10, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES and KENDAL SASSO did knowingly and intentionally distribute a mixture and substance containing a detectable amount of

cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 16

(Distribution of a Controlled Substance,
21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2)

The Grand Jury further charges:

16. On or about March 9, 2022, through March 10, 2022, in the Northern District of Ohio, Eastern Division, Defendant RODWRICK BARNES and KENDAL SASSO did knowingly and intentionally distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 17

(Making a False Statement in Acquisition of a Firearm, 18 U.S. C. § 922(a)(6))

The Grand Jury further charges:

17. On or about May 7, 2021, in the Northern District of Ohio, Eastern Division, Defendant AMANDA CAMPBELL, in connection with the acquisition of a firearm, to wit: Taurus ARMAS / Taurus, 9 mm caliber pistol, model PT111G2A, serial number ACC694104, from Cashland, 2904-2908-N Ridge Rd., East, Ashtabula, Ohio, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that she was the actual buyer of said firearm, when in fact, she was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 18

(Making a False Statement in Acquisition of a Firearm, 18 U.S. C. § 922(a)(6))

The Grand Jury further charges:

18. On or about May 19, 2021, in the Northern District of Ohio, Eastern Division, Defendant AMANDA CAMPBELL, in connection with the acquisition of a firearm, to wit: Taurus ARMAS / Taurus, 9X19 caliber pistol, model G3C, serial number ACC625250, from Cashland, 2904-2908-N Ridge Rd., East, Ashtabula, Ohio, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that she was the actual buyer of said firearm, when in fact, she was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

COUNT 19

(Making a False Statement in Acquisition of a Firearm, 18 U.S. C. § 922(a)(6))

The Grand Jury further charges:

19. On or about March 7, 2022, in the Northern District of Ohio, Eastern Division, Defendant AMANDA CAMPBELL, in connection with the acquisition of a firearm, to wit: Glock / Glock, Inc., 9X19 caliber pistol, model 43, serial number BFTV501, from Cashland, 2904-2908-N Ridge Rd., East, Ashtabula, Ohio, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearm under the provisions of Chapter 44, Title 18 of the United States

Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that she was the actual buyer of said firearm, when in fact, she was not the actual buyer of the firearm, in violation of Title 18, United States Code, Section 922(a)(6).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d)(1); and Title 28, United States Code Section 2461(c), the allegations of Counts 1 through 19 are incorporated herein by reference. As a result of the foregoing offenses, Defendants RODWRICK BARNES, FRANCINE COREY, KENDAL SASSO, and AMANDA CAMPBELL, shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the federal drug violations; any and all of their property used or intended to be used in any manner or part to commit or to facilitate the commission of the federal drug violations; and any and all firearms and ammunition involved in or used in the commission of the federal firearm violations, including, but not limited to, the following properties:

- a. a Taurus, revolver, model 82, .38 caliber, bearing serial number VA929758, and ammunition, seized on March 8, 2022; and
- b. a Glock pistol, model 43, 9mm caliber, bearing serial number BFTV501, and ammunition, seized on March 8, 2022.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.